Fair Opportunity Notice

Task Order Proposal
US EPA Region 2
ERRS Contract EP-S2-15-01
Holy Trinity Cemetery Site RV1
Lewiston, NY

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FAIR OPPORTUNITY NOTICE
HOLY TRINITY CEMETERY SITE RV1

In accordance with Clause H.52, "CO ADDED ORDERING UNDER MULTIPLE AWARD CONTRACTS," this is a notice to all multiple awardees (contractors) under the current EPA Region 2, Emergency Rapid Response Services (ERRS) contracts to provide responses to information requests in order to be given fair opportunity and consideration of a potential Task Order to be issued for the Holy Trinity Cemetery (HTC) Site. The Site is located in Lewiston, NY.

A task order will be issued to collect, secure and dispose of radioactive contaminated solids which are releasing into the environment. The Site consists of one parcel located to the west of Roberts Avenue in Lewiston, New York. All work will be conducted in accordance with the attached Statement of Work.

Responses to the information requests on page 4 will be evaluated in the appropriate realm of technical expertise and experience with this particular type of response; proximity of the contractor's labor and equipment resources to the work site; and past performance on similar, prior tasks. In addition to the contract fixed rates for labor and equipment, potential cost savings will be considered in the evaluation of cost.

For this selection, non-cost factors are equal to cost.

In order to be given full consideration for the award of the task order, responses to the attached information requests must be received by close of business on September 25, 2015.

Background

In a 1978 U.S. Department of Energy (U.S. DOE) aerial radiological survey, more than 15 properties throughout the region were identified as having elevated levels of radiation above background. It is believed that, in the early 1960s, slag from the local Union Carbide facility was used as fill on the properties prior to paving. The slag contained sufficient quantities of uranium and thorium to be classified as a licensable radioactive source material. Union Carbide subsequently obtained a license from the Atomic Energy Commission (now the Nuclear Regulatory Commission) and the State of New York; however, the slag had been used as fill throughout the Niagara Falls region prior to licensing. Based on the original survey and subsequent investigations, it is believed that the radioactive Union Carbide slag was deposited at the Holy Trinity Cemetery property.

The Holy Trinity Cemetery site is bordered: to the north and east by Interstate 190; to the south by another cemetery; and to the west by Robert Avenue and a residential area. The site consists of two areas of radionuclide contamination located at a cemetery of approximately 31.5 acres in Lewiston, New York. The first area of contamination (Area 1) is about 2.8 acres (119,137 square feet). The area of observed contamination is located in the northernmost portion of the property and north of the only building at the site. This area is on a relatively flat and slightly elevated grassy field, as well as on existing roadbeds. The building south of the first contaminated area is utilized as a residence, a chapel and cemetery maintenance facility. The second area of contamination (Area 2) is a roadway located on the eastside of the property. This area is about 0.4 acres (15,845 square feet) in size.

Analytical results obtained from New York State, USEPA Pre-Remedial Program and USEPA Removal Program assessments indicate that material comprising the earthen layer of the majority of this site property is contaminated with radionuclides significantly higher than at background conditions (i.e., greater than 2x background concentrations). The contamination is present underneath:

- The aforementioned Area 1.
    - Radioactive material was placed in this area to construct a road. The roadway was never constructed. There is no real shielding provided in this grassy field that continues to be visited by neighbors and dog walkers. The cemetery personnel were asked to stop mowing this area to prevent inhalation hazard as well as to diminish chance of airborne material to migrate.
- The aforementioned Area 2.
    - Radioactive material was placed in this area to construct a road. The roadway was never constructed. There is no real shielding provided in this dirt road and up until recently, cemetery personnel were relocating grave fill along this roadway and there were signs of trespassers.

The purpose of this Task Order is to eliminate the threat of:

- Direct contact with the radioactive material via inhalation.
- Off-Site migration of radioactive material via clothing, footwear, vehicle traffic.
- Exposure to elevated gamma radiation located throughout the site.

Statement of Work:

Depending on various factors, there may be one or a combination of the tasks listed below required to be performed.

1. **Pilot Study Shielding:** There is a possibility that shielding may be implemented in certain areas instead of removing the contaminated material. If so, radiation test shielding will be conducted in areas designated by the USEPA On-Scene Coordinator (OSC). This may include the outdoor property and possibly interior spaces. Surfaces that may be shielded could be concrete, asphalt or earthen layer. A small forklift will be required for lifting ½" steel plates of a 3' X 3' dimension. The weight of ½" plate is 20.5 lbs/ft^2. Six plates of ½" X 3' X 3'. Weight per sheet is 184 lbs. A 4" pre cast concrete slab of a 3' X 3' minimum dimension is also required for the radiation test shielding. Directions to pick up location to be provided by OSCs. This material will be provided by the government.

2. **Above Grade Shielding:** The contractor may have to provide installation of shielding in accordance with a detailed action/work plan. The plan is to be developed after test shielding has been completed and the technical team reviews are completed. This shielding may be installed in areas of radiation levels designated suitable by the technical team. Shielding design may include ½" – 1" steel plates (multiple panels) and/or 4000 psi concrete. The shielding may also contain a Lead (Pb) layer sealed within the other shielding materials.

3. **Excavation of portions of the contaminated slag-soil prior to shielding:** This option could potentially entail excavation of soil/aggregate Areas 1 and 2. Material will be staged properly for eventual disposal. Once designated amount of material is removed, shielding will be installed as per technical team specifications.

4. **Excavation of all of the contaminated slag-soil without shielding:** This option could potentially entail excavation of soil/aggregate Areas 1 and 2. Material will be staged properly for eventual disposal. Once designated amount of material is removed, clean fill, concrete and/or asphalt will be installed.

5. **Off-site disposal of all hazardous substances identified and recovered during the course of the removal action.**

6. **Off-site disposal of hazardous waste and/or substances will comply with the Off-Site Rule, 40 CFR 300.440.**

7. **Conduct all operations in accordance with applicable Federal and State safety standards.**

8. **Additional technical direction will be provided by the OSC through daily work orders**.

   EPA considers some of the planned activities in this SOW to be subject to Construction Wage Rate Requirements (formerly known as the Davis Bacon Act) wages.

Information Requests Regarding the Holy Trinity Cemetery Site RV1

Please provide the assumptions made in developing your response to the questions below regarding the SOW for this Task Order.

1. Describe how your staffing and resource plan for this Task Order will be implemented to minimize lodging and per diem expenses.

GES Response: GES will assign qualified personnel with the expertise to perform under the requirements for this task order as described in the Scope of Work. To the extent practical, GES will source experienced personnel who are located in close vicinity to the site in order to lower travel and per diem costs. If this is a long term project GES will attempt to hire local personnel. If lodging and per -diem expenses are incurred, GES will follow the FTR lodging and per-diem rates for the county it is working in as stated on the GSA website travel rates for 2015. GES will obtain bid documentation to insure the lodging is at or below the Federal Travel Rate (FTR) for lodging. If on -site operations cease due to weekend breaks, severe weather conditions or federal holidays, GES will evaluate the cost savings of demobilization versus payment of per diem / lodging for its project personnel. The scenario which is the most cost effective to the EPA will be implemented. GES, to the choice availabl e, will utilize local subcontractors from within a 50 mile radius to reduce travel and per diem costs from our subcontractors. This is a primary example in which GES can save the EPA from additional per diem and lodging cost to the project.

2. Identify any other cost saving measures you may have planned in implementing the SOW for this Task Order

GES Response: For this project cost savings will come from managing the project efficiently and evaluating the various remedies proposed. GES understands that excavation and/or shielding are potential remedies. Key GES personnel have experience with shielding low level radiological material. The Response Manager (RM) and Transportation and Disposal Coordinator (T&D) are skilled in obtaining waste profile approval and locating the most cost effective disposal option for this type of waste. Reducing downtime between the excavation phase of the project and the load out of the waste is critical to the success of a high profile project such as this. GES will competitively bid all subcontract services to give the government the best value possible.

3. Based on the SOW provided, provide a brief outline of tasks/subtasks and indicate any critical path tasks to be performed as well as prioritizing each task identified.

GES Response: Project Management and field activities to be accomplished will include:

- Establish a work plan outlining the proposed pilot study along with procedures for an excavation plan with a comprehensive schedule including all on-site operations.

- Perform competitive procurement for sub-contractor services which will be initiated through a formal request for proposal (RFP). Qualified bidders will be vetted and approved prior to use. A valid certificate of insurance and previous safety questionnaire along with reps and certs will be mandatory from subcontractors and evaluated by GES from all successful bidders.

- A site specific Health and Safety Plan will be developed to eliminate the threat of direct contact or inhalation of radioactive material. GES will evaluate current and past information provided by the EPA to develop the HASP. Any changes made to the HASP will be reviewed first by GES's Safety Manager and approved by the EPA On-Scene Coordinator before it is implemented.

Prior to commencement of field activities GES will review with the EPA any relevant documents for all of the previous work performed on s ite. GES will assess the tasks and implement the safest and most productive approach that will provide continuity for operations to continue work without interruption.

GES will mobilize its personnel and equipment to respond and perform the remedial activities at the Holy Trinity site including:

- Review the HASP and Work Plan activities with the crew prior to commencing field work.
- Meet with the OSC to discuss means and methods of protecting the public and preventing unauthorized access to the work areas.
- Establishing work zones and exclusion zones, providing project support facilities including: temporary equipment storage, project signage and portable toilets.
- Secure the site by providing/repairing temporary fencing as necessary.
- Use flagging, stakes or spray paint to delineate the excavation areas as presented by the OSC or their designee.
- Conduct disposal sampling as required for offsite disposal of these materials. Submit waste profiles to the selected disposal facility.
- Conduct Pilot test with shielding materials provided by the government.
- Provide transportation and disposal of Site waste at facilities in compliance with the off-site rule 40 CFR 300.440.
- Backfill and restore the site to the original condition.
- Ensure operations are conducted in accordance with applicable Federal and State safety standards.
- Discuss daily work orders with the OSC and update as required.

GES understands that some of the planned activities in this SOW to be subject to Construction Wage Rate Requirements (formerly known as the Davis Bacon Act) wages.

4. Indicate which response activities your company will be self-performing and which, if any, will be subcontracted. Identify any anticipated labor categories subject to Construction Wage Rate Requirements.

GES Response: GES will manage the overall project and its subcontractors involved. GES has a wide-range of experience in excavation and will perform all of this work. GES will perform the excavation of contaminated soil, asphalt or debris. Loading of trucks a nd backfilling and restoration operations. GES will also self-perform the shielding operations if that remedy is selected. GES will procure transportation and disposal options through its transportation and disposal coordinator. Anticipated Construction Wage Rates are:

Laborers

Operators

Subcontracted services anticipated:

Analytical Laboratory

Transportation

Disposal

Backfill Hauler

5. Identify sites at which your company has had relevant/similar operational experience (Radioactive contaminated material). Please be specific as to which tasks on these Sites are relevant to this SOW.

Remacor Project PA, US EPA Region 3

This former magnesium metal processing facility contained drums of radioactive material. The scope of work included maintaining security, conducting stabilization of contaminated materials, providing testing for off site disposal and excavation and removal. In total 560 drums were loaded for off site disposal.

Strube Inc., Lancaster, PA, US EPA Region 3

This project involved warehouses containing surplus military parts including radioactive dials. GES was contracted to provide around the clock security and package materials for disposal from several warehouse locations. 1787 drums of radioactive waste were transported off site for disposal.

Merrimack Industrial Metals, NH, US EPA Region 1

GES executed a $1.7M removal action by **excavating 7,455 tons** of PCB/lead soils. GES complied with ARARs and attended meetings with NHDES and local officials. Erosion/sediment controls were installed

to protect adjacent wetlands and dust controls implemented. GES screened and stabilized stockpiles of PCB/lead soils; removed metallic debris and installed geotextile/earthen cap over soils remaining on site.